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BY ECF

Honorable Jesse M. Furman  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Juan B. Pujol Moreira, et al. v. Société Générale, S.A., et al.*, No. 20-cv-9380-JMF

Dear Judge Furman,

Pursuant to Your Honor's Individual Rules 2(D) and 3(G), we respectfully request that you allow Plaintiffs argument on Defendants' motion to dismiss. Our argument would be presented by James Barta, an associate with MoloLamken LLP.

We believe our brief clearly sets forth the basis for complete denial of Defendants' motion. However, in addition to providing the opportunity for Mr. Barta to argue before the Court, the hearing would also allow the Court to raise any questions it might have about the Helms-Burton Act, which is invoked fairly infrequently.

Should argument in any way slow down a decision on the motion, we, of course, would be willing to waive it in the interest of swift justice for our clients. We would have no objection to Defendants having a junior lawyer on their side argue as well should they wish to be heard.

Sincerely,

/s/ Steven F. Molo  
Steven F. Molo

cc: All counsel of record by ECF